

1 MS. BOSMAN: I object to that.

2 MR. KEACH: Would you read the
3 question back, please?

4 (The last question was read by the
5 reporter.)

6 A. I don't know what that means.

7 Q. Do you understand the question, Ms.
8 Jimino?

9 A. No.

10 Q. Okay. Do the non-unionized employees have
11 a separate policy regarding sick leave donations?

12 MR. BAILEY: Object to the form.
13 You can answer.

14 A. I don't know. That would be up to the
15 sheriff.

16 Q. So the sheriff has full discretion with
17 respect to non-unionized employees affected by sick
18 leave donations, is that correct?

19 MR. BAILEY: Object to the form.
20 You can answer.

21 A. Yes.

22 Q. So previous to November of 2014 a union
23 employee from any branch of the county government

1 could donate sick leave time to a designated
2 individual, correct?

3 MR. BAILEY: Object to the form.

4 A. I don't know. The UPSEU contract governs
5 UPSEU employees. I'm not familiar with other union
6 contract policies in terms of sick bank.

7 Q. I'm not meaning that. So if I'm a member,
8 say I'm an employee with the Probation Department for
9 the County of Rensselaer and I want to donate my sick
10 leave time to somebody in the Sheriff's Department
11 that's not a member of the union. Are you aware of
12 any prohibition for that process if I wanted to do
13 that?

14 MR. BAILEY: Object to the form.

15 A. If a bank has been established for an
16 individual, then it would be -- and that individual was
17 exempt, then it would be up to the sheriff to determine
18 whether or not his people can donate to a bank that's
19 established.

20 Q. Whether his people can donate?

21 A. Yes.

22 Q. And how do you know that?

23 A. Because the sheriff would set policy for his

1 exempt employees.

2 Q. How do you know that?

3 A. Because I don't set policy for him, because
4 the sheriff is a separately elected official, thus he
5 would set policy.

6 Q. But the sheriff policies for his exempt
7 employees are not permitted to affect the policy
8 that's set by other departments outside of the
9 Sheriff's Department, am I correct?

10 MR. BAILEY: Object to the form.

11 A. I don't understand the question. I'm sorry.

12 Q. The sheriff does not have the right to set
13 policy for employees who are members of other arms of
14 county government, am I correct?

15 A. That's correct.

16 Q. And have you ever seen a written policy
17 regarding sick leave donations?

18 A. Yes, in the UPSEU contract.

19 Q. Outside of that contract?

20 A. I have not, no.

21 Q. Are those unionized employees --
22 withdrawn. Is the policy with respect to the sick
23 banks and the donation of sick leave prior to November